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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KEA DAVINA FIELDS, individually,

 Plaintiff,

Case No.: 2:22-cv-01917-APG-EJY

DIANE REESE, individually; THE
 CHURCH OF JESUS CHRIST OF
 LATTER-DAY SAINTS; DOE
 INDIVIDUALS 1–20, inclusive; and ROE
 CORPORATIONS 1–20, inclusive,

 Defendants.

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY**

(Third Request)

Defendants Diane Reese and The Church of Jesus Christ of Latter-day Saints, a Utah corporation sole (CHC) and Plaintiff Kea Davina Fields hereby stipulate to extend the remaining discovery and pretrial deadlines by 30 days. This is the parties' third request to extend the deadlines.

I. CURRENT DEADLINES.

The following are the current deadlines:

CURRENT DEADLINE	EVENT
05/18/23	Deadline for Initial Expert Disclosures
06/20/23	Deadline for Rebuttal Expert Disclosures
07/17/23	Close of Discovery
08/14/23	Deadline for Dispositive Motions
09/11/23	Deadline for the Joint Pretrial Order (the filing of a dispositive motion will suspend the joint pre-trial order deadline until 30 days after a decision on the motion or until otherwise ordered by the court)

II. DISCOVERY CONDUCTED TO DATE.

The parties have conducted or scheduled the following discovery:

Date	Event
12/14/22	Plaintiff served her initial disclosure of documents and witnesses.
12/15/22	Defendants served their initial disclosure of documents and witnesses.
01/12/23	Defendants served their first set of requests for production to Plaintiff.
02/13/23	Plaintiff underwent an independent medical examination.
02/27/23	Plaintiff served her responses to Defendants' first set of requests for production.
03/15/23	Defendants served their first supplemental disclosure of documents and witnesses.
03/31/23	Defendants served their second supplemental disclosure of documents and witnesses.
04/06/23	Defendants deposed Plaintiff.
04/27/23	Defendants served their third supplemental disclosure of documents and witnesses.
04/27/23	Plaintiff served a first set of requests for production to Diane Reese, which remain pending.
04/27/23	Plaintiff served a first set of interrogatories to Diane Reese, which remain pending.
04/27/23	Plaintiff served a first set of requests for admission to Diane Reese, which remain pending.
06/01/23	Plaintiff will depose Diane Reese.

III. DESCRIPTION OF THE REMAINING DISCOVERY.

The parties wish to disclose experts, serve additional written discovery and subpoenas duces tecum, and depose additional nonparty witnesses and experts.

IV. REASONS FOR EXTENDING THE DEADLINES.

LR 26-3 states the following, in relevant part:

A motion or stipulation to extend any date set by the discovery plan, scheduling order, or other order must, in addition to satisfying the requirements of LR IA 6-1, be supported by a showing of good cause for the extension. A motion or stipulation to extend a deadline set forth in a discovery plan must be received by the court no later than 21 days before the expiration of the subject deadline. A request made within 21 days of

1 the subject deadline must be supported by a showing of good cause. A
2 request made after the expiration of the subject deadline will not be granted
3 unless the movant also demonstrates that the failure to act was the result of
excusable neglect.

4 The parties have been in discussions to explore a possible resolution of the case. Those discussions
5 remain ongoing, and the parties wish to avoid incurring the fees and costs associated with initial
6 expert disclosures to see if the case can be resolved. For that reason, they wish to extend the initial
7 expert disclosure deadline and all other pretrial deadlines by 30 days.

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1 **IV. ~~PROPOSED~~ EXTENDED DEADLINES.**

2 The parties propose extending the deadlines as follows:

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PROPOSED EXTENDED DEADLINE	CURRENT DEADLINE	EVENT
06/19/23	05/18/23	Deadline for Initial Expert Disclosures
07/20/23	06/20/23	Deadline for Rebuttal Expert Disclosures
08/16/23	07/17/23	Close of Discovery
09/13/23	08/14/23	Deadline for Dispositive Motions
10/11/23	09/11/23	Deadline for the Joint Pretrial Order (the filing of a dispositive motion will suspend the joint pre-trial order deadline until 30 days after a decision on the motion or until otherwise ordered by the court)

13 IT IS SO STIPULATED.

14 DATED this May 17, 2023.

DATED this May 17, 2023.

15 MCNUTT LAW FIRM. P.C.

DIMOPOULOS INJURY LAW

16 /s/ Matt Wolf

/s/ Michael Shirts

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Counsel for Plaintiff

Counsel for Defendants

22 IT IS SO ORDERED.

23 
 24 UNITED STATES MAGISTRATE JUDGE

25 DATED: May 17, 2023